

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

JEFF BONOMO,)
)
 Plaintiff,)
)
 v.) Case No. 4:19-cv-3394-SEP
)
 THE BOEING COMPANY,)
)
 Defendant.)

**JOINT MOTION TO JOIN FOR TRIAL WITH
CASE No. 4:21-cv-00411-SEP AND TO CONTINUE CURRENT TRIAL DATE**

COME NOW the Parties, through their respective counsel, pursuant to Federal Rule of Civil Procedure 42(a)(1), and hereby move that this case be joined for trial with a related action currently pending before this Court styled *Jeff Bonomo v. The Boeing Company*, 4:21-cv-00411-SEP. In support thereof, the Parties state:

1. This case was filed on November 4, 2019, and removed to this Court on December 30, 2019.
2. Discovery is complete in this case, and it is currently scheduled for trial on August 2, 2021 (Defendant's Motion for Summary Judgment is pending).
3. A related case is also pending before this Court styled *Jeff Bonomo v. The Boeing Company*, 4:21-cv-00411-SEP.
4. The Parties believe that judicial efficiency and economy would be served by joining this case and Case No. 4:21-cv-00411 for purposes of trial.
5. Rule 42(a) states: "Consolidation. If actions before the court involve a common question of law or fact, the court may: (1) join for hearing or trial any or all matters at issue in the actions . . ."

6. This action and Case No. 4:21-cv-00411 involve common questions of law (i.e., the Missouri Human Rights Act) and numerous facts (i.e., Plaintiff's employment with Defendant and his applications for employment with Defendant). As such, the Parties respectfully request that the current trial date of August 2, 2021, be continued to April of 2022 or thereafter, and that this case and Case No. 4:21-cv-00411-SEP be joined for trial.

WHEREFORE, the Parties respectfully request the Court enter an order joining this case and Case No. 4:21-cv-00411-SEP for trial, and issue any other relief the Court deems just and proper.

Respectfully submitted,

PONDER ZIMMERMANN LLC

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CERTIFICATE OF SERVICE

The undersigned certifies that on May 28, 2021 the foregoing was served via the Court's electronic filing system to:

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